SEALED

KSC/02.01.24 AOA: USAO #2023R00384

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

* * *

UNITED STATES OF AMERICA

v.

UNDER SEAL *

CRIMINAL NO. JKB 24 Cr 35

AARON MCNEIL a/k/a "Skeeta,"

with Intent to Distribute Controlled Substances, 21 U.S.C. § 846; Possession with Intent to Distribute Controlled * Substances, 21 U.S.C. § 841; Possession of a Firearm and Ammunition by a Prohibited Person, 18 U.S.C. § 922(g);

Possession of a Firearm in Furtherance of a Drug Trafficking Crime, 18 U.S.C. * § 924(c); Conspiracy to Commit Money

(Conspiracy to Distribute and Possess

Laundering, 18 U.S.C. § 1956(h);

* Money Laundering, 18 U.S.C. § 1956(a); Forfeiture, 18 U.S.C. §§ 924(d) and 982(a)(1) and (b)(1), 21 U.S.C. § 853, 28

U.S.C. § 2461)

Defendants.

INDICTMENT

COUNT ONE

(Conspiracy to Possess with Intent to Distribute Controlled Substances)

USDC-BALTIMORE 24 FEB 7 PM7:25

The Grand Jury for the District of Maryland charges that:

From in or about January 2022, and continuing through in or about July 27, 2023, in the

District of Maryland and elsewhere,

AARON MCNEIL, a/k/a "Skeeta,"

the defendants herein, did knowingly, willfully and unlawfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to knowingly, intentionally, and unlawfully distribute and possess with intent to distribute 400 grams or more of a quantity of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenyl-ethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II controlled substance, 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, and 280 grams or more of a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code Section 841(a)(1).

21 U.S.C. § 846

COUNT TWO
(Possession with the Intent to Distribute Controlled Substances)

<u>COUNT THREE</u> (Possession of a Firearm by a Prohibited Person)

COUNT FOUR

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

COUNT FIVE (Conspiracy to Commit Money Laundering)

The Grand Jury for the District of Maryland further charges that:

From in or about June 30, 2022, and continuing through in or about July 13, 2022, in the District of Maryland and elsewhere, the defendants,

AARON MCNEIL, a/k/a "Skeeta,"

did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956 and Section 1957, to wit, to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, by obtaining cashier's checks from various financial institutions and depositing U.S. currency into an A1 Trucking Global Enterprise, LLC Navy Federal Credit Union account (x7910), for which the defendant Brown is the signatory, and subsequently using the same funds to make a vehicle purchase, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

18 U.S.C. § 1956(h)

18 U.S.C. § 2

COUNT SIX (Concealment Money Laundering)

COUNT SEVEN (Promotion Money Laundering)

<u>COUNT EIGHT</u> (Promotion Money Laundering)

<u>COUNT NINE</u> (Promotion Money Laundering)

COUNT TEN(Possession with the Intent to Distribute Controlled Substances)

The Grand Jury for the District of Maryland further charges that:

On or about July 27, 2023, in the District of Maryland, the Defendant,

AARON MCNEIL, a/k/a "Skeeta,"

did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenyl-ethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code Section 841(a)(1).

21 U.S.C. § 841(a) 21 U.S.C. § 841(b)(1)(C)

COUNT ELEVEN (Possession of a Firearm by a Prohibited Person)

The Grand Jury for the District of Maryland further charges that:

On or about July 27, 2023, in the District of Maryland, the defendant,

AARON MCNEIL, a/k/a "Skeeta,"

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms and ammunition—that is a Smith & Wesson Model 36, .38 caliber loaded special revolver (serial number 187745) and the firearm and ammunition were in and affecting commerce.

18 U.S.C. § 922(g)(1)

COUNT TWELVE

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

The Grand Jury for the District of Maryland further charges that:

On or about July 27, 2023, in the District of Maryland, the Defendant,

AARON MCNEIL, a/k/a "Skeeta,"

did knowingly possess a firearm, to wit, a Smith & Wesson 36, .38 caliber loaded special revolver (serial number 187745), in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a), as alleged in Count Eleven of this Indictment.

18 U.S.C. § 924(c)(1)(A)

<u>COUNT THIRTEEN</u> (Possession with the Intent to Distribute Controlled Substances)

FORFEITURE

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the Defendants that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. §§ 924(d) and 982(a)(1) and (b)(1), 21 U.S.C. § 853, and 28 U.S.C. § 2461(c), in the event of the Defendants' convictions under Counts One through Fourteen of this Indictment.

Narcotics Forfeiture

2. Upon conviction of the offense(s) alleged in Counts One, Two, Ten, or Thirteen of this Indictment, the Defendants,

AARON MCNEIL, a/k/a "Skeeta,"

shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a):

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense(s); and
- any property used, or intended to be used, in any manner or part, to commit, or facilitate the commission of, such offense(s).

Firearms and Ammunition Forfeiture

3. Upon conviction of the offense(s) alleged in Counts Three, Four, Eleven, or Twelve of this Indictment, the Defendants,

AARON MCNEIL, a/k/a "Skeeta,"

16

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in such offense(s).

Money Laundering Forfeiture

4. Upon conviction of the offense(s) alleged in Counts Five through Nine of this Indictment, the defendants,

AARON MCNEIL, a/k/a "Skeeta,"

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in such offenses, or any property traceable to such property.

Property Subject to Forfeiture

5. The property to be forfeited includes, but is not limited to, the following:

cc. a Smith & Wesson 36, .38 special revolver bearing serial number 187745, and approximately four rounds of .38 caliber ammunition loaded therein seized from Aaron McNeil's residence at 1221 N. Patterson Park Ave., Baltimore, Maryland on or around July 27, 2023; and

Substitute Assets

- 6. If, as a result of any act or omission by the Defendants, any of the property described above as being subject to forfeiture:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third person;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property up to the value of the forfeitable property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 924(d)

18 U.S.C. § 982(a)(1) and (b)(1)

21 U.S.C. § 853

28 U.S.C. § 2461(c)

Erek L. Berron / AA

United States Attorney

A TRUE BILL

Foreperson SIGNATURE REDACTED

Date:

217/24